

MOUNT & STOELKER, P.C.  
RIVERPARK TOWER, SUITE 1650  
333 WEST SAN CARLOS STREET  
SAN JOSE, CALIFORNIA 95110-2740  
TELEPHONE (408) 279-7000

Daniel S. Mount, Esq. (Cal. Bar No. 77517)  
Kathryn G. Spelman, Esq. (Cal. Bar No. 154512)  
Daniel H. Fingerman, Esq. (Cal. Bar No. 229683)  
Kevin M. Pasquinelli, Esq. (Cal. Bar No. 246985)  
Mount & Stoelker, P.C.  
RiverPark Tower, Suite 1650  
333 West San Carlos Street  
San Jose CA 95110-2740  
Phone: (408) 279-7000  
Fax: (408) 998-1473  
Email: dmount@mount.com  
kspelman@mount.com  
dfingerman@mount.com  
kpasquinelli@mount.com

Attorneys for Defendants Romi Mayder, Wesley Mayder,  
Silicon Test Systems Inc., and Silicon Test Solutions LLC

United States District Court  
Northern District of California, San Jose Division

VERIGY U.S. INC., a Delaware corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;  
WESLEY MAYDER, an individual;  
SILICON TEST SYSTEMS INC., a  
California corporation; SILICON TEST  
SOLUTIONS LLC, a California limited  
liability corporation,

Defendants.

Case No. 5:07-cv-04330 (RMW) (HRL)

**Declaration of Kevin Pasquinelli in Support of  
Defendants' Administrative Motion For Leave  
To File Documents Under Seal**

Judge: Hon. Howard R. Lloyd

MOUNT & STOELKER, P.C.  
RIVERPARK TOWER, SUITE 1650  
333 WEST SAN CARLOS STREET  
SAN JOSE, CALIFORNIA 95110-2740  
TELEPHONE (408) 279-7000

1 I, Kevin Pasquinelli, declare as follows:

2 1. I am an attorney with the law firm of Mount & Stoelker, P.C., counsel for the  
3 Defendants in this action, Romi Mayder, Wesley Mayder, Silicon Test Systems Inc., and Silicon Test  
4 Solutions LLC (collectively, "Defendants"). I have personal knowledge of the facts set forth in this  
5 declaration and, if called upon to testify in this Court as to those facts, my testimony would be as  
6 stated herein.

7 2. I submit this declaration in support of *Defendants' Administrative Motion For Leave*  
8 *To File Documents Under Seal*.

9 3. I have reviewed the document entitled *Defendants' Notice of Motion and Motion to*  
10 *Compel Amended Responses and Production of Responsive Documents to Defendants Second Set of*  
11 *Requests for Production of Documents on Plaintiff Verigy, Motion for Fees and Sanctions*. I have  
12 determined that portions of this document contain information that has been designated  
13 "Confidential" or "Highly Confidential — Attorneys' Eyes Only" by one or more parties under the  
14 Stipulated Protective Order (although Defendants reserve the right to challenge certain designations  
15 asserted by Verigy).

16 4. I have reviewed the document entitled *Declaration of Kevin M. Pasquinelli in Support*  
17 *of Defendant's Motion to Compel Production of Responsive Documents*. I have determined that this  
18 document's exhibits A, B, C, and J have been designated "Confidential" or "Highly Confidential —  
19 Attorneys' Eyes Only" by one or more parties under the Stipulated Protective Order (although  
20 Defendants reserve the right to challenge certain designations asserted by Verigy).

21 5. I have concluded that the parties' confidentiality interest therefore overcomes the right  
22 of public access to the record, as a substantial probability exists that the parties' overriding  
23 confidentiality interests will be prejudiced if the record is not sealed. The proposed sealing is  
24 narrowly tailored, and I am not aware of any less-restrictive means to achieve the parties' overriding  
25 interests.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
2 and correct and that this declaration was executed on the date below at San Jose, California.

3  
4 Dated: April 9, 2008

Kevin M. Pasquinelli

5 \_\_\_\_\_  
/s/

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

MOUNT & STOELKER, P.C.  
RIVERPARK TOWER, SUITE 1650  
333 WEST SAN CARLOS STREET  
SAN JOSE, CALIFORNIA 95110-2740  
TELEPHONE (408) 279-7000